

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

IN RE: T-MOBILE CUSTOMER DATA)	MDL No. 3019
SECURITY BREACH LITIGATION)	
)	Case No. 4:21-md-03019-BCW
)	
)	
)	

**DECLARATION OF GERALD THOMPSON IN SUPPORT OF
PLAINTIFFS' RESPONSE TO LETTER FROM WILLIAM RODRIGUEZ**

I, Gerald Thompson, declare as follows:

1. I am the Executive Vice President & Founder of the Global Cyber Group for Intersections LLC d/b/a Pango ("Pango"), the provider of Identity Defense Complete, whose principal office is located at 250 Northern Avenue, 3rd floor, Boston, MA. I am over 21 years of age and am authorized to make this declaration on behalf of Pango and myself. The following statements are based on my personal knowledge.

2. On or about December 13, 2024, the Settlement Administrator, Kroll Administration LLC, sent an email to Settlement Class Members who had indicated through the Settlement claim process that they wanted to receive Identity Defense Complete, the identity protection and credit monitoring services provided by the Settlement. The email prompted them to enroll in Identify Defense Complete by clicking on the provided URL.

3. Settlement Class Members who clicked on the URL were then taken to Pango's website and prompted to provide some personal information, including their name, email address, Social Security number, and phone number, to enroll in Identity Defense Complete. Settlement Class Members were also asked to authorize Pango to monitor their credit file in order to send

real-time alerts when a credit inquiry initiates. This authorization also allows Pango to obtain their credit report and/or credit score in order to provide this service to the class member. This authorization was sought for the sole purpose of providing to the Settlement Class Member the identity protection and credit monitoring services provided through Identity Defense Complete. Without authorization to monitor their credit file and access their credit scores and/or credit reports, Pango cannot provide the identity protection and credit monitoring services.

I declare under penalty of perjury under the laws of the United States that the above is true and correct to the best of my knowledge.

Executed on January 17, 2025, in Sparta, New Jersey.

Signed by:

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Gerald Thompson